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Arizona Corporation Commission

DOCKETED

MAR 29 2011

Via Overnight Delivery

March 28, 2011

Docket Control Center
Arizona Corporation Commission
1200 W. Washington Street, Room 108
Phoenix, Arizona 85007-2996

DOCKETED BY	
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RE: Liberty-Bell Telecom, LLC, Docket No. T-20752A-10-0307

Dear Sir/Madam:

Enclosed for submission to the Arizona Corporation Commission are an original and thirteen (13) copies of Liberty-Bell Telecom, LLC's *Motion to Expedite Proceeding* ("Motion") in the above-captioned matter. By its *Motion* the Company seeks an expedited procedural schedule, enabling the Company to introduce new services throughout its multi-state operating territory. Copies of the Company's *Motion* have been served on the service list.

Please acknowledge receipt of this filing by file-stamping and returning the copy of this letter and amended and restated Attachment A in the self-addressed, postage-paid envelope included. Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.

Andrew O. Isar

Regulatory Consultants to
Liberty-Bell Telecom, LLC

Enclosure

cc: Service List

RECEIVED
2011 MAR 29 P 2:05
ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

IN THE MATTER OF THE APPLICATION
OF LIBERTY-BELL TELECOM, LLC FOR
APPROVAL OF A CERTIFICATE OF
CONVENIENCE AND NECESSITY TO
PROVIDE RESOLD LONG DISTANCE,
RESOLD LOCAL EXCHANGE, AND
FACILITIES-BASED LOCAL EXCHANGE
TELECOMMUNICATIONS SERVICES.

2011 MAR 29 P 2:05

ARIZONA CORPORATION COMMISSION
DOCKET NO. T-20752A-10-0307 DOCKET CONTROL

MOTION TO EXPEDITE PROCEEDING

Liberty-Bell Telecom, LLC ("Liberty-Bell") respectfully requests that the Arizona Corporation Commission amend its *Procedural Order Setting Hearing Date* of March 15, 2011, to expedite the hearing and other associated deadlines. Liberty-Bell makes this request to meet accelerating business goals which include the launch of Liberty-Bell's residential services in Arizona and across the 14-state Qwest service territory by May 18, 2011. This motion is made pursuant to A.C.C. R14-3-106 of the Commission's Rules of Practice and Procedure.

Liberty-Bell has conferred with assigned staff and staff counsel about expediting the procedural schedule and is unaware of any opposition to the request.

BACKGROUND

Liberty-Bell filed an Application for a Certificate of Convenience and Necessity ("CC&N") to provide resold long distance, resold local exchange and facilities-based local exchange telecommunications services within the State of Arizona on July 22, 2010. Liberty-Bell also asked the Commission to classify its services a competitive. A proposed tariff was submitted at the same time.

On November 22, 2010, Liberty-Bell filed a notice informing the Commission that its parent, Liberty-Bell LLC, had been acquired by DISH Media Holdings Corporation. Liberty-Bell informed the Commission that the acquisition would not impact the Company's operations.

Staff issued its First Set of Data Requests to Liberty-Bell on January 5, 2011. Nine days later, Liberty-Bell filed an amended and restated Attachment A to its Application. Liberty-Bell provided responses to Staff's First Set of Data Requests on January 20, 2011.

Staff recommended approval of the Application with conditions on March 4, 2011.¹ Liberty-Bell does not object to those conditions. Staff also recommended that the services provided by Liberty-Bell be classified as competitive.

On March 15, 2011, ALJ Kinsley issued an order with the following procedural schedule:

April 11, 2011:	Publication of Notice
April 29, 2011:	Liberty-Bell shall file Affidavit of Publication
April 29, 2011:	Intervention deadline
May 13, 2011:	Objections to interventions due
	Comments on Staff Report
June 1, 2011:	Hearing

DISCUSSION

At about the time of the release of the procedural schedule it was decided that Liberty-Bell would rollout its residential voice service which will be bundled either high-speed internet access or satellite television, or both, across the Qwest region by May 18, 2011.² Liberty-Bell understands that a final Commission grant of a Certificate of a CC&N may not be issued for a month or more following hearing, allowing for the issuance of a draft Order and Commissioner deliberation. Further, upon issuance of a CC&N, Liberty-Bell will be required to submit a tariff and performance bond to complete the certification process. Under the existing procedural schedule, the Company anticipates that it would not be authorized to provide telecommunications services in Arizona until possibly as late as mid-July.

Liberty-Bell is engaged in a region-wide service introduction throughout the entire Qwest Corporation territory. Liberty-Bell has expended considerable resources and effort to

² Satellite television services are provided in conjunction with Dish Networks.

coordinate a region-wide marketing campaign that will commence on or about May 18, 2011. Further, the Company is dedicating staff resources, including customer service, operations, and senior management staff to support this region-wide deployment. Under the current procedural schedule Arizona will be the only state where the Company would not have intrastate operating authority by the May 18, 2011 deployment date.

A systematic and contemporaneous region-wide service introduction is crucial to the success of its marketing campaign and operations support due to the synergistic nature of its multi-state efforts. Launching service in Arizona later this summer will delay the introduction of a competitive service into the residential market. It will also undermine region-wide service efforts that the Company has worked to complete, and potentially increase the Company's costs of market entry in Arizona, separate from that in other states.

In light of the foregoing, Liberty-Bell respectfully requests that the procedural schedule be expedited. In so doing, Liberty-Bell is prepared to shorten any time periods established for its compliance with the schedule. For example, Liberty-Bell proposes to reduce the time period for it to file its affidavit of publication or objections to interventions. Liberty-Bell has prepared the following proposed schedule for the Commission's consideration:

April 5, 2011:	Publication of Notice
April 12, 2011:	Liberty-Bell to file Affidavit of Publication
April 19, 2011:	Motions to intervene
April 22, 2011:	Objections to Motions to intervene Comments due on Staff Report
April 26, 2011:	Hearing

If this schedule, or another adopted by the Commission, is finalized, the Company will submit to ALJ Kinsley a revised notice reflecting the expedited schedule prior to publication. Liberty-Bell hopes that by compressing the schedule, a recommended decision and Commission order can be issued in time to allow the Company to include Arizona in its launch on May 18,

2011. The Company is prepared to file its tariff and comply with any conditions in the Staff Report by April 29, 2011.

CONCLUSION

In order to ensure that it can meet its goals of providing a bundle of services to residential consumers in Arizona that will include voice, internet and satellite television services by May 18, 2011, Liberty-Bell requests that the Commission expedite the current procedural schedule. Liberty-Bell is prepared to discuss other alternative schedules as well.

Respectfully submitted this 28th day of March, 2011,

Liberty-Bell Telecom, LLC


By: _____

Jay Weber
Executive Vice President
2460 West 26th Avenue
Suite #380-C
Denver, CO 80211

CERTIFICATE OF SERVICE

I, Andrew O. Isar, do hereby certify that I have this day served the foregoing *Motion to Expedite Procedure* on all parties of record in this proceeding by mailing a copy thereof, properly addressed with first class postage prepaid to the individuals listed below.

Dated at Gig Harbor, WA, this 28th day of March, 2011

A handwritten signature in black ink, appearing to read "Andrew O. Isar", written over a horizontal line.

(Signature)

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